### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

BRIDGESTONE SPORTS CO., LTD.,	and
BRIDGESTONE GOLF, INC.,	

C.A. No. 05-132 (JJF)

Plaintiffs,

v.

ACUSHNET COMPANY,

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## DECLARATION OF BRANDON WHITE

- My name is Brandon White, and I am an associate at the law firm of Paul, 1. Hastings, Janofsky & Walker LLP. I represent the plaintiffs in the above-captioned case.
- I make this declaration in support of Bridgestone's Answering Brief in Opposition 2. to Acushnet's Motion for Leave to Supplement its Invalidity Contentions.
- Attached as Exhibit 1 is a true and correct copy of a printout from the U.S. Patent 3. and Trademark Office's ("PTO") website. This printout shows the results of my searches for all issued U.S. Patents that have been assigned to Acushnet and that reference the "newlyidentified" patents, U.S. Patent Nos. 5,779,563; 5,872,185; 5,967,908; 6,174,247 and 6,267,694, all of which are assigned to Bridgestone. Bridgestone's '563 patent was cited 17 times in patents assigned to Acushnet; the '185 patent was cited 10 times; the '908 was cited 8 times, the '247 was cited 15 times, and the '694 was cited 14 times.
- To create Exhibit 1, I accessed the PTO's Full Text and Image Database 4. (http://patft.uspto.gov/netahtml/PTO/search-adv.htm). I searched for all issued U.S. Patents that were assigned to Acushnet and that referenced the newly-cited patents.
  - For example, for U.S. Patent No. 5,779,563, my search terms were: 5.

# AN/("Acushnet") and REF/("5779563")

- 6. According to the PTO, "[s]earching in the REF field...will retrieve a list of other patents which contain this patent number in their full-text. This list will include those other patents which cite the subject patent as prior art on their front pages...To search for a document citing a particular patent as prior art, you should search for the patent number in this field."
- 7. Similarly, the AN field, is an abbreviation for assignee name, and contains the name of the individual or entity to whom ownership of the patent was assigned at the time of patent issue.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and recollection.

Dated: January 18, 2007

Brandon White

#### **CERTIFICATE OF SERVICE**

I, Jack B. Blumenfeld, hereby certify that on January 18, 2007 I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

> Richard L. Horwitz, Esquire POTTER ANDERSON & CORROON LLP 1313 N. Market Street Wilmington, DE 19801

and that I caused copies to be served upon the following in the manner indicated:

#### BY HAND AND E-MAIL

Richard L. Horwitz, Esquire Potter Anderson & Corroon LLP 1313 N. Market Street Wilmington, DE 19801

#### BY FEDERAL EXPRESS AND E-MAIL

Joseph P. Lavelle, Esquire Howrey LLP 1299 Pennsylvania Avenue, NW Washington, DC 20004

/s/ Jack B. Blumenfeld (#1014)

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